(c) REMARKS

The claims are 28 and 29. In the communication dated February 15, 2007 (Paper 20070206), the Examiner withdrew new claims 26 and 27 (erroneously referred to as Claims 25-26) as directed to the non-elected species of Fig. 3 (plurality of impedance circuits detachably connectable to the high frequency power supply means). Without necessarily agreeing or disagreeing and solely to expedite prosecution Claims 26 and 27 (erroneously labeled with the same claim number as Claim 26) have been cancelled in favor of new claims 28 and 29. Claims 28 and 29 are clearly directed to the species of Fig. 5.

The claims now provide for a plurality of impedance matching circuits, each of which circuits corresponds to each of the plurality of different movable reactors. A high frequency power supply means is detachably connected to a movable reactor via one impedance matching circuit, and such a circuit is in each of the movable reactors. These features are recited, *inter alia*, on page 16, lines 24-32 for Fig. 5 in which the impedance matching circuits 101U, 151U and 161U are provided, respectively, in each of movable reactors 101, 151 and 161 to connect to the high frequency power supply means. Figs 1, 6A, 6B, 7A and 7B on pages 20-24 show, for example, high frequency power supply means 110 connected via 214 to impedance regulator 240 connected to power electrodes 211 to match impedances at the power supply means. Therefore, the claims correspond to the elected species of Fig. 5.

Claims 12 and 13 again have been rejected as obvious over Japanese Patent No. 11-319656 (Okamura et al.) in view of U.S. Patent No. 5, 515,986 (Turlot et al.). The

Examiner states that Okamura teaches all the elements of the claims, except that "Okamura et al. fail to teach an impedance regulation means provided on the side of each reactor that allows for different impedance for each reactor." The Examiner then points to Fig. 5c of Turlot et al. as showing different chambers with different impedances brought about by the different inductors attached to the chambers. The rejection is respectfully traversed.

Okamura et al. discloses the use of the same impedance matching circuit (1110) for matching sequentially the impedance of a plurality of the same type of movable reactors (1100) with the impedance of a power source (1111). Turlot et al., discloses a system for performing parallel processing using a plurality of reactors or chambers (1). The system simultaneously connects the plurality of chambers (1) to a single power source via a central matching network. Each of the plurality of chambers (1) is equipped with an inductor (see Fig. 5c) for performing fine adjustments to the RF power conditions therein.

Applicants submit that one of ordinary skill in the art would not look to combine Okamura et al. with Turlot et al. because Okamura et al. discloses a system for sequentially processing substrates via movable reactors of the same type, each being separately connectable with a single power source at a given time, whereas Turlot et al. discloses a system for parallel processing substrates via stationary reactors (chambers) that are simultaneously connected to a single power source at a given time. Skilled artisans looking to perform sequential processing would not consider the parallel system of Turlot et al. for at least the reason that, for example, if a power disturbance occurs during parallel processing, then all the substrates being processed in parallel would be adversely affected. Conversely, skilled artisans looking to perform parallel processing would not consider the

sequential system of Okamura et al. for at least the reason that sequential processing would not be able to mass produce a large quantity of substrates at the same time, unlike parallel processing.

Further, there is no suggestion in Okamura et al. that the disclosed system could be adapted for use in a parallel processing arrangement; and there is no suggestion in Turlot et al. that the disclosed system could be adapted for use in a sequential processing arrangement. Accordingly, there is no suggestion to combine the teachings of these references.

Additionally, it appears that the Examiner uses impermissible hindsight analysis. It is well established that picking and choosing disparate features from the disclosures of non-analogous prior art references, using the claimed invention as a template, is not a proper way to establish the unpatentability of a claim.

Finally, even assuming *arguendo* that Okamura et al. could be combined with Turlot et al., nothing in either of these references discloses a plasma treatment apparatus having a plurality of different movable reactors that each "perform a different plasma treatment from another of the plurality of different movable reactors," as recited in claim 28.

Accordingly, claim 28 is seen as patentable over any possible combination of the cited references and withdrawal of the rejection under 35 U.S.C. § 103(a) is earnestly requested. Claim 29 depends from claim 28 and is believed to be patentable for at least the same reasons as discussed above. Thus, the claims should be allowed and the case passed to issue.

Applicants' undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

/Peter Saxon/
Peter Saxon
Attorney for Applicants
Registration No. 24,947

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3801
Facsimile: (212) 218-2200

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